



IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

DAVID DELL'AQUILA, LORANNDA  
BORJA, TODD CHESNEY, and  
BRENT WEBER, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

v.

NATIONAL RIFLE ASSOCIATION OF  
AMERICA

Defendant.

Case No. 3:19-cv-00679

Judge William L. Campbell, Jr.

Magistrate Jefferey S. Frensley

**NATIONAL RIFLE ASSOCIATION OF AMERICA'S UNOPPOSED  
MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO PLAINTIFFS'  
MOTION FOR LEAVE TO AMEND COMPLAINT**

Defendant, National Rifle Association of America ("Defendant") pursuant to Fed. R. Civ. P. 6(b)(1) and LR 6.01(a), respectfully moves this Court for an extension of time up to and including July 25, 2023, to respond to Plaintiffs' Motion for Leave to Amend Complaint (Dkt. Nos. 131-133). In Support of its Motion, Defendant states as follows:

1. On June 30, 2023, before the 4<sup>th</sup> of July weekend, Plaintiffs filed their Motion for Leave to Amend Complaint (Dkt. Nos. 131-133). As such, the original deadline for Defendant's opposition is July 14, 2023.
2. On June 30, 2023, Plaintiffs also served on Defendant a production of Documents in response to Defendant's discovery requests.
3. On July 7, 2023, via email, Plaintiffs' Counsel conveyed that Plaintiffs have no objection to an extension of the original deadline to July 25, 2023.

4. Except for this extension request and modification, all other deadlines in the Order setting case deadlines (Dkt. 128) remain in full force and effect. Plaintiff shall file their motion for class certification on or before October 20, 2023. Defendant shall respond by November 20, 2023. Any optional reply shall be filed by December 4, 2023.

For these reasons, Defendant respectfully requests that the Court grant this Motion and grant an extension of time up to and including July 25, 2023, to respond to Plaintiffs' Motion for Leave to File Third Amended Complaint.

By: /s/ Wallace A. McDonald  
Wallace A. McDonald  
BPR No. 016210  
LACY, PRICE & WAGNER, P.C.  
249 N. Peters Rd.  
Suite 101  
Knoxville, TN 37923  
Phone: 865-246-0800  
Email: amcdonald@lpwpc.com

*Attorneys for Defendant*

By: /s/Malvina Palloj  
William A. Brewer (admitted *pro hac vice*)  
Malvina Palloj (admitted *pro hac vice*)  
BREWER, ATTORNEYS & COUNSELORS  
750 Lexington Ave, Floor 14  
New York, NY 10013  
Phone: 212-489-1400  
Email: wbb@brewerattorneys.com  
Email: mpalloj@brewerattorneys.com

*Attorneys for Defendant*

## **CERTIFICATE OF SERVICE**

I, Malvina Palloj, hereby certify that I caused a true and exact copy of the foregoing to be electronically filed with the Clerk of the Court on July 7, 2023, using the CM/ECF system, which will send notification to all counsel of record as listed below.

John R. Wingo, Esq.  
Stites & Harbison, PLLC  
401 Commerce Street, Suite 800  
Nashville, TN 37219  
Email: john.wingo@stites.com

Thomas M. Hanson  
Michael Kanovitz  
Jonathan I. Loevy  
Jordan Cosby Poole  
Julia Rickert  
Heather Elizabeth Sticht  
Loevy & Loevy  
311 N Aberdeen Street  
Third Floor  
Chicago, IL 60607  
Email: hanson@loevy.com  
Email: mike@loevy.com  
Email: jon@loevy.com  
Email: poole@loevy.com  
Email: julia@loevy.com  
Email: sticht@loevy.com

Elizabeth C. Wang  
Loevy & Loevy  
2060 Broadway  
Suite 460  
Boulder, CO 80302  
Email: elizabethw@loevy.com

Wallace Allen McDonald, Esq.  
Lacy, Price & Wagner, P.C.  
249 North Peters Rd.  
Suite 101  
Knoxville, TN 37923  
Email: amcdonald@lpwpc.com

William Andrew Brewer, IV  
Brewer, Attorneys & Counselors  
750 Lexington Ave, 14th Floor  
New York, NY 10022  
Email: WBB@brewerattorneys.com

Dated: July 7, 2023

Respectfully submitted,

/s/ *Malvina Palloj*  
Malvina Palloj